

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF WEST VIRGINIA  
MARTINSBURG**

**UNITED STATES OF AMERICA,**

v.

**Criminal Action No. 3:21-CR-49  
(GROH)**

**JONATHAN TOEBBE and  
DIANA TOEBBE,**

Defendants.

**UNITED STATES' NOTICE OF SECOND RULE 16 DISCLOSURE**

Now comes the United States of America and William J. Ihlenfeld, II, United States Attorney for the Northern District of West Virginia, by Jarod J. Douglas, Assistant United States Attorney for said District, and hereby provides notice of disclosure to defense counsel of its Second Rule 16 disclosure. The disclosure is comprised of two duplicate thumb drives containing an Eclipse database of records bates numbered 8024 through 246139 and files in folders named "Jail Calls," "JT Unclass Computer," "JT Cell Phone Image," and "DT Cell Phone Image," which are being provided outside of the Eclipse database.

Respectfully submitted,

WILLIAM J. IHLENFELD, II  
UNITED STATES ATTORNEY

By: /s/ Jarod J. Douglas  
Jarod J. Douglas  
Assistant U. S. Attorney

**CERTIFICATE OF SERVICE**

I, Jarod J. Douglas, Assistant United States Attorney for the Northern District of West Virginia, hereby certify that on the 18th day of January 2022, the foregoing UNITED STATES' NOTICE OF SECOND RULE 16 DISCLOSURE was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Nicholas J. Compton, Esq.  
Assistant Federal Public Defender  
MVB Bank Building  
651 Foxcroft Avenue, Ste. 202  
Martinsburg, WV 25401  
*Counsel for Defendant Jonathan Toebbe*

Edward B. MacMahon, Jr., Esq.  
107 E. Washington Street  
Middleburg, VA 20117  
*Counsel for Defendant Diana Toebbe*

Barry P. Beck, Esq.  
Power, Beck & Matzureff  
308 W. Burke Street  
Martinsburg, WV 25401  
*Counsel for Defendant Diana Toebbe*

I hereby certify further that on the 15th day of January 2022, the United States' Second Rule 16 disclosure was placed in the mail to defense counsel at the above addresses.

WILLIAM J. IHLENFELD, II  
UNITED STATES ATTORNEY

By: /s/Jarod J. Douglas  
Jarod J. Douglas  
Assistant U. S. Attorney